

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MANUEL DE JESUS ROSARIO,

Plaintiff,

-against-

MIS HIJOS DELI CORP., PALMA GROCERY CORP.,
251 E. 123RD ST. REALTY, LLC, JOSE PALMA,
LEONIDA COLLADO, and JUNIOR PALMA,

Defendants.

No. 15-CV-6049 (LTS)(DCF)

**NOTICE OF DEFENDANTS’
MOTION FOR SUMMARY
JUDGMENT**

Defendants Palma Grocery Corp. and Leonida Collado (hereinafter “Defendants”), by and through the undersigned counsel, respectfully moves this Court, at such date and time as the Court may direct, for an Order Granting Summary Judgment dismissing Plaintiff’s Complaint pursuant to Rule 56 of the Federal Rules of Civil Procedure for Summary Judgment. In support of this motion, Defendants rely on the accompanying (i) Rule 56.1 Statement of Material Facts, (ii) Memorandum of Law in Support of Motion for Summary Judgment, (iii) Declaration of Argilio Rodriguez, Esq. (and Exhibits attached thereto) and (iv) all the pleadings and proceedings herein.

Dated: New York, New York
October 19, 2016

/s/ Argilio Rodriguez, Esq.
By: Argilio Rodriguez, Esq.
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Attorneys for Plaintiff

CERTIFICATION OF SERVICE

I, Argilio Rodriguez, hereby certify that on October 19TH, 2016, I caused a copy of the attached Notice of Defendants' Motion for Summary Judgment, Memorandum of Law, Attorney Affidavit and Local Rule 56.1 Statement to be served: (i) electronically on all counsel registered for electronic service in this action; and (ii) by mail to opposing counsel.

Dated: New York, New York
October 19, 2016

/s/Argilio Rodriguez
Argilio Rodriguez, Esq.